

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: TDS Metrocom
Contact Todd McNally
Telephone Number: 608-441-7959
e-mail: todd.mcnelly@tdsmetro.com

Subject Matter Expert (SME): Todd McNally
Telephone Number: 608-441-7959
e-mail: todd.mcnelly@tdsmetro.com

Authorized Representative: Rod Cox
Telephone Number: 608-663-3029
e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: Fact that Access, Collocation and LEC Services Billing is not considered within the scope of SBCs Performance Measurements.

Brief Description: After months of work already under way, it has recently come to TDS Metrocoms attention that SBC has not been considering Access, Collocation or LEC Services Billing in the scope of performance measurements.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? July 2003
2. How many occurrences and approximately over how long a period of time? Not

applicable to this issue.

3. Is it a recurring problem? Not applicable to this issue.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBCs attempt to limit their exposure related to billing.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? TDS Metrocom does not believe that it is.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. July 2003 via email to Jim Ehr.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. July 2003 via email to Jim Ehr.
3. Last known position of the opposing carrier. As of July 23, SBC has not responded to our inquiry regarding this issue.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated any policy or procedures to address this issue, nor is TDS aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *The inclusion of all aspects of billing into not only performance measurements, but all other initiatives currently under way currently as well as those in the future*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
TDS' issue is more accurately stated as a concern with the current, ongoing Billing PM collaborative discussions. In that collaborative, the CLECs and SBC are dependent upon discussions and negotiations in the CLEC User Forum (CUF) Billing sub-team meetings, in which TDS is very active and holds a leadership role. It came to SBC's PM SME's attention at the same time as TDS' representatives that that joint SBC/CLEC effort (the CUF Billing sub-team) had neglected to address inclusion or exclusion of Access, Collocation or LEC Services Billing in its definition of a revised billing claims resolution process.

SBC PM SMEs have reviewed the issue presented in an email from Todd McNally to Jim Ehr, and were prepared to discuss the issue in a Billing PM collaborative call on Thursday, August 7, 2003. However, TDS, along with most all other CLECs, chose not to participate on that call. SBC discussed the issue on the August 19 Billing PM Collaborative call, and agreement was reached to add Collocation claims to the proposed PMs on a diagnostic basis until the Collocation claims process can be fully addressed in the CUF Billing-Sub-Team. The additional claim types would be discussed in future PM collaboratives. SBC believes TDS' issue regarding which services and products should or should not be included in new billing PMs is best addressed through those future collaborative processes.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
In an email from Todd McNally of TDS on August 7, 2003, to the Billing PM Collaborative participants, SBC understands TDS to have stated its position on the new Billing PMs with regard to this issue as follows: "We think that now that SBC has informed us that only the Local/Unbundled side of the house is within scope of this measure, the "Levels of Disaggregation" should be reflected to clearly state that." SBC agrees to add such clarifying language to the pertinent new billing PMs.
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *James D. Ehr*
Telephone Number: (847) 248-4375
e-mail: *je2471@sbc.com*

Authorized Representative: *J. Upholzer*
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e-mail: *ju6791@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

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II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

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Authorized Representative: Rod Cox
Telephone Number: 608-663-3029
e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: Change Management/Internal Controls.

1. Brief Description: TDS Metrocom feels that there is lacking internal controls within SBCs Billing OSS as it relates to change management. For example, we have reason to believe that when there are changes required to their billing OSS due to either interconnection agreement amendments, tariff changes, commission orders, etc, that each of the required changes are not necessarily implemented correctly and/or in a timely manner.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? Although TDS Metrocom has reason to believe that this issue has been valid for some time, we have discovered specific examples of this issue in October 2002.
2. How many occurrences and approximately over how long a period of time? Specific to this issue, we do not have any idea as to the volume of these adjustments due to the fact that our research remains underway.
3. Is it a recurring problem? TDS Metrocom continues to determine whether it is or not.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that once the extent of this issue is better understood, the cause will be SBCs inadequate billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? Unknown at this time.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. Via email with SBC in October 2002.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. Via email with SBC in October 2002.
3. Last known position of the opposing carrier. SBC has acknowledged that they had billed TDS Metrocom incorrectly due to change management events in the past.
4. Were any bill adjustments made to resolve this issue? TDS Metrocom is continuing to investigate the extent of this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? TDS Metrocom is not aware of any, nor has SBC made us aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *Provide documentation of SBCs process in place to assure that all aspects of change management events that affect their billing OSS are implemented, tested and audited.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

The rate tables utilized in SBC's Billing OSS provide SBC the flexibility to modify a CLEC's rates for interconnection agreement amendments, tariff changes, commission orders, etc., as identified by TDS Metrocom. SBC does not believe that there is an issue with the change management process due to the steps that SBC has undertaken to verify that a timely and accurate updating of rate table occurs, as described in the Supplemental Affidavit of Justin W. Brown, Mark J. Cottrell and Michael E. Flynn that SBC submitted in support of its Michigan Supplemental 271 application with the FCC. The affidavit, which is attached below, describes how the billing systems, known as CABS, are updated with the appropriate rate table information.



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In addition, SBC conducts Production Validation of the rate tables by verifying that the new price schedule of the CLEC matches the production tables used for CLEC billing. These steps include:

- *verifying that the rate for USOCs and Class of Service matches the new price schedule;*
- *verifying that the date for USOC/Class of Service matches the effective date on the price schedule;*
- *notifying the applicable departments of any discrepancies in order to take corrective action; and*
- *repeating the validation process until the validation is correct.*

This process ensures that the rates used for billing of services purchased by CLECs match the expectations of SBC and the CLECs.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation?
SBC plans to discuss two proposed rate table performance measurements with MCI and other CLECs at the next Six-Month PM Review meetings scheduled for October 2003. The proposed measurements are called: "Rate Table Update Accuracy," and "Rate Table Correction Timeliness."
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A.*
4. Identify any other carrier(s) known to have experienced similar problems.

MCI in this docket raised a similar issue (See MCI Issue #4).

5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Denise Kagan*

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Authorized Representative: *John T. Anderson*

Telephone Number: *314-235-5020*

e-mail: *ja3478@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
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4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

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Subject Matter Expert (SME): Todd McNally
Telephone Number: 608-441-7959
e-mail: todd.mcnelly@tdsmetro.com

Authorized Representative: Rod Cox
Telephone Number: 608-663-3029
e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: Circuit to circuit reconciliation.

1. Brief Description: Although TDS Metrocom is currently researching this issue, we have reason to believe that SBC is billing us for circuits that we no longer have, and had sent disconnect orders to them.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? July 2003
2. How many occurrences and approximately over how long a period of time?

Specific to this issue, we do not have any idea as to the volume of these adjustments due to the fact that our research remains underway.

3. Is it a recurring problem? TDS Metrocom continues to determine whether it is or not.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that once the extent of this issue is better understood, the cause will be SBCs inadequate billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? Unknown at this time.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? No
2. Was this issue escalated for dispute resolution? If so, when and in what forum? No
3. Last known position of the opposing carrier. SBC has acknowledged that they had billed TDS Metrocom for disconnected circuits in the past.
4. Were any bill adjustments made to resolve this issue? TDS Metrocom is continuing to investigate the extent of this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? TDS Metrocom is not aware of any, nor has SBC made us aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *Agreement by SBC to a collaborative effort between our two companies to reconcile circuit inventories.*
- 2.) *Audit of SBCs current process to assure that 100% of exceptions are corrected and invoices adjusted accordingly.*
- 3.) *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Although this appears to be the same issue as "TDS-13 Disconnected Circuits"

raised by TDS Metrocom, given their description it is very difficult to investigate this issue further. In fact, it does not appear that TDS has an "issue." Rather, it is attempting to ascertain if there is an issue.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *TDS Metrocom is attempting to ascertain if there is an issue.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Peggy Beata*

Telephone Number: *(312) 335-7340*

e-mail: *tr5972@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *(214) 858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*
Contact *Todd McNally*
Telephone Number: *608-441-7959*
e-mail: *todd.mcnally@tdsmetro.com*

Subject Matter Expert (SME): *Todd McNally*
Telephone Number: *608-441-7959*
e-mail: *todd.mcnally@tdsmetro.com*

Authorized Representative: *Rod Cox*
Telephone Number: *608-663-3029*
e-mail: *rod.cox@tdsmetro.com*

IV. Issue Identification

Name: *Dispute Claim Acknowledgement/Resolution Notice Inconsistency*
Brief Description: *SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc. However, TDS Metrocom does not consistently receive either acknowledgement or resolution notices for each of our claims. We experience a variety of scenarios including:*

1. *Seeing adjustments on our invoices relating to claims, however we never received either an acknowledgement or a resolution notification.*
2. *We receive dispute claim resolutions for claims we submitted, however are not able to validate that the adjustment communicated with that resolution appeared on our*

invoice.

3. We receive dispute claim resolution notices for adjustments that we never submitted a claim for.
4. SBC does not consistently send acknowledgement or resolution notices to the same person that submitted the claim.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? May 2003
2. How many occurrences and approximately over how long a period of time? Estimated in the hundreds.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBCs inadequate billing OSS. Specifically checks and balances, audits, etc.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? TDS Metrocom does not believe that it is.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. June 2003 via submission of issue to the Billing Sub Team Forum.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. June 2003 via submission of issue to the Billing Sub Team Forum.
3. Last known position of the opposing carrier. SBC has not yet communicated their position of this issue to TDS Metrocom.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated any policy or procedures to address this issue, nor is TDS aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *Perform an audit to assure that each claim submitted to date by a CLEC gets an acknowledgement and resolution notice.*
- 2.) *Some periodic audit to monitor #1 above due to change management issues.*
- 3.) *Documented process illustrating how claims are received from a CLEC, a related acknowledgement notice is sent, the claim is worked by SBC, and finally, a resolution notice is sent.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

SBC does not have reason to believe that TDS' allegations above are true. Additionally, SBC does not believe that TDS' description above accurately represents the CLEC impact of the current billing claims and dispute process, nor the LSC's adherence to that process. In any event, the issues raised by TDS are being addressed in another forum. See below.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain

SBC does not believe this issue to involve an interpretation or application of law.

3. What performance measures can be implemented to monitor the desired system operation?

During the next six-month review, SBC is proposing the following PMs in order to measure its performance with respect to the billing dispute and resolution process.

PM CLEC BLG-2 - Measures the percent of time that SBC Midwest acknowledges CLEC billing claims/disputes within 5 business days of receipt by SBC Midwest.

PM CLEC BLG-3 - Measures the percent of time that SBC Midwest sends claims resolution notifications to the CLEC within 30 business days of receipt by SBC Midwest.

4. Any other pertinent information?

The LSC's policy is to acknowledge each CLEC claim that is received by the LSC Billing team. The acknowledgement merely provides the CLEC with a notification that SBC had received the CLEC's claim.

Once a claim is resolved, the LSC policy is to provide the CLEC with a resolution notice via email. Until this step is done, the claim is still considered open. If the CLEC has provided a detailed spreadsheet, LSC policy calls for the spreadsheet, containing SBC's findings, to be attached to the resolution letter.

If CLECs believe that acknowledgements, resolution notices, or CLEC-initiated detailed spreadsheets containing SBC's findings are not being transmitted, they should bring specific examples to the attention of the LSC Billing Management team or, as TDS Metrocom notes above, to the Subcommittee of the CLEC User Forum as a process issue. Given that TDS Metrocom has admittedly opened this issue on a business-to-business basis in the Subcommittee of the CLEC User Forum, SBC is unclear as to why TDS Metrocom also found it necessary to request that the issue be addressed in this forum as well. This issue should be removed from this proceeding.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

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Telephone Number: 608-441-7959
e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: Rod Cox
Telephone Number: 608-663-3029
e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: Dispute Claim Processing Timeliness
Brief Description: TDS Metrocom has been experiencing serious delays in the acknowledging as well as the resolution of billing claims.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? September 2002
2. How many occurrences and approximately over how long a period of time?
Nearly 100. Since August 2002.

3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBCs inadequate billing OSS.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? TDS Metrocom does not believe that it is.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? High.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. February 2003 with SBC Account Management in a face-to-face meeting. Several occasions prior to this face-to-face meeting via phone conversations with SBC Account Management. Also submitted as an issue at the Billing Sub Team Forum.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. February 2003 with SBC Account Management in a face-to-face meeting. Several occasions prior to this face-to-face meeting via phone conversations with SBC Account Management. Also submitted as an issue at the Billing Sub Team Forum.
3. Last known position of the opposing carrier. SBC has communicated that TDS Metrocom has the ability to escalate each individual exception.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated any policy or procedures to address this issue, nor is TDS aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *Perform an audit to assure that each claim submitted to date by a CLEC gets an acknowledgement and resolution notice.*
- 2.) *Some periodic audit to monitor #1 above due to change management issues.*
- 3.) *Documented process illustrating how claims are received from a CLEC, a related acknowledgement notice is sent, the claim is worked by SBC, and finally, a resolution notice is sent.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

Not a known issue to the LSC.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

SBC does not believe this issue to involve an interpretation or application of law.

3. What performance measures can be implemented to monitor the desired system operation?

During the next six-month review, SBC is proposing the following PMs in order to measure its performance in regard to the billing dispute and resolution process.

PM CLEC BLG-2 - Measures the percent of time that SBC Midwest acknowledges CLEC billing claims/disputes within 5 business days of receipt by SBC Midwest.

PM CLEC BLG-3 - Measures the percent of time that SBC Midwest sends claims resolution notifications to the CLEC within 30 business days of receipt by SBC Midwest.

4. Any other pertinent information?

*As of this response, TDS Metrocom has ***23*** open claims that are not resolved with the LSC in the amount of ***(redacted)***. These open claims are between 0 and 30 days old. TDS Metrocom also has ***16*** claims in the amount of ***(redacted)*** that are between 31 and 60 days old. TDS Metrocom does not have any open claims requiring resolution that are more than 60 days old.*

The LSC is not aware of any recent issues related to the timeliness of acknowledging and resolving claims. The LSC would again request that TDS Metrocom supply specific examples of any such delays to the LSC Billing team Manager so that the validity of TDS' concern can be determined and the appropriate action taken.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

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e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Frederick C. Christensen*

Telephone Number: *(414)-319-5617*

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Authorized Representative: *Carla Rowland*

Telephone Number: *214-464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: *(short identifier) Calling Name Delivery Service (CNAM)*

Brief Description: *Charges are assessed to TDS Metrocom for the look up of calling name and number delivery. Charges are assessed at a switch/point code level. In November 2002, we received a large back bill from SBC for this activity. Issues we discovered with this invoice include, but not limited to;*

1. *Invoice contained 16 months worth of back billing.*
2. *SBC was billing us at inaccurate rates.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in November 2002.

2. How many occurrences and approximately over how long a period of time?

Thousands. This was a problem affected approximately 18 months worth of billing before it was finally corrected on our February 2003 invoice.

3. Is it a recurring problem? *Not since January 2003.*

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS and inaccurate rate table information.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom does not feel that it does.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue (Please do not re-argue your case here or submit supporting documents.)

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed as far back as December 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management as well as dispute claims filed as far back as December 2002.

3. Last known position of the opposing carrier.

SBC acknowledged the validity of our dispute claim and made the appropriate changes to their billing OSS.

4. Were any bill adjustments made to resolve this issue?

Yes.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom assumes that SBC made some changes to their billing OSS to correct this issue.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Perform an audit to assure that all exceptions are indeed identified.*
2. *Periodic audit to identify back sliding.*
3. *Audit to validate volume activity.*
4. *Documented process how CNAM activity is validated, charges are assessed and audited in case of a dispute.*

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem. *Two issues comprised the back billing amount to TDS Metrocom. The first issue involved a problem in recording usage at the Service Control Point where CNAM queries are processed. The second issue involved a problem with unbilled usage on TDS switches that had not previously been placed on the bill.*

Usage Recording Failure

In July 2002, SBC Midwest discovered that when it consolidated CNAM query usage onto a single platform, the usage-recording queue at the SCP was not recording and retaining a record of all queries processed. The queue was actually overwriting its usage recordings when query volumes increased to a very high level. This problem began when SBC Midwest consolidated its CNAM query usage onto its AIN SCPs in December 2001, and was corrected in August 2002. Because this queue recorded all query messages, the billing impact affected all customers to SBC Midwest's CNAM Database (which includes CLECs and non-CLECs alike). SBC Midwest estimated the lost usage based upon each customer's historical usage patterns and then back billed for the effective period. For TDS Metrocom, this back billing occurred in November 2002. The majority of TDS Metrocom's back billing was a direct result of this recording failure.

Unbilled Usage

At the same time SBC Midwest was investigating the usage recording failure, SBC Midwest discovered five TDS Metrocom switches that had not been placed onto TDS Metrocom's billing account. This finding was the result of billing improvement efforts SBC Midwest had self-initiated beginning in February 2002. SBC Midwest added the five TDS switches to TDS Metrocom's invoice dated May 2002. After SBC Midwest corrected the problems with its recording queue, SBC Midwest then back billed TDS for CNAM queries from July 2001 through July 2002.

Inaccurate Rates

The rates SBC Midwest used to back bill TDS Metrocom reflected a previous contract and were not correct for TDS Metrocom at the time. TDS Metrocom brought the issue of the incorrect rates to SBC Midwest's attention in December 2002, and SBC Midwest corrected TDS Metrocom's CNAM rates in January 2003.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
It does not.
3. What performance measures can be implemented to monitor the desired system operation?

The majority of the back billed usage resulted from the failure of a recording queue at the SCP associated with the consolidation of all CNAM traffic onto the AIN SCPs. That queue has since been fixed and is now working as required. The consolidation of the CNAM traffic was a singular event that will not recur.

4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
SBC Midwest believes that it has resolved all issues with TDS Metrocom. SBC Midwest received a payment in April 2003 from TDS Metrocom for all outstanding CNAM balances.
2. Were any bill adjustments made to resolve this issue?
Yes. SBC Midwest applied adjustments to reflect TDS Metrocom's effective contracted rates. Although not contractually obligated, SBC Midwest also adjusted TDS Metrocom's invoice to reflect a 12-month back-billing period. All adjustments were issued on TDS Metrocom's invoices dated March 2003.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
The adjustments were communicated to TDS Metrocom via phone conversations and written correspondence directly between the parties. An accessible letter was not issued.
4. Identify any other carrier(s) known to have experienced similar problems.
Failure of the recording queue affected the billing records for all CNAM customers. This includes all CLECs, RBOCs, independent telephone companies, and hub providers. SBC Midwest back billed impacted carriers for the period covered by the failure of the usage recording queue (December 2001 through July 2002).

While researching its back billing efforts, SBC Midwest discovered Northern Telephone and Data Corporation (NTD) was billed an incorrect rate for CNAM queries. SBC discovered this incorrect rate in November 2002 and corrected billing for NTD on its invoice dated December 2002 (including a credit for prior months' usage billed at the incorrect rate).

5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
SBC Midwest has implemented several proactive steps to ensure complete, accurate, and timely billing of CNAM usage. These proactive steps include:
 - *Establishment of a review process (in progress) of all CLEC rates billed in LEC Services Billing (LSB). This review process will be ongoing.*
 - *Assignment of additional personnel to review unbilled usage files and investigate the appropriate customer to bill. This review process is ongoing.*
 - *Reinforcement of coordination efforts between the billing group and the account teams to improve overall understanding by the billing group*

regarding individual accounts.

- *Revision of Access Service Request processing so that the LSB will receive a copy of each ASR for CNAM query access.*

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Yes. As identified in B6 above, we have changed our processing of Access Service Requests so that a copy of each ASR for CNAM query access is sent to the LSB. This should limit unbilled usage and cause new point codes to be billed in a timely manner. For application of correct rates, we have modified our procedures for rate notification so that the LSB will receive a copy of all new contract rates. Regarding the usage recording failure, the recording queue was enhanced to eliminate the overwriting of usage records. Since the queue is now performing as required, this event will not recur.

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: SBC

Contact : James Jermain

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Subject Matter Expert (SME): Diann Thiem

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Authorized Representative: Joe Tesson

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X. Further Investigative Activities (for staff use only)

XI. Final Disposition (for staff use only)

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: 608-441-7959

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: 608-441-7959

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: 608-663-3029

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: (short identifier) *Collocation Power*

1. Brief Description: *In May 2003, TDS Metrocom discovered that SBC was inappropriately billing us for collocation power. Specifically, SBC is not billing power based on usage as stated in our ICA. They are also charging us for redundant power.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in May 2003.

2. How many occurrences and approximately over how long a period of time?

Exact number of occurrences is unknown at this time. This has affected SBCs billing accuracy ever since TDS Metrocom first started purchasing collocation power and continues with current billing.

3. Is it a recurring problem?

Yes.

4. Your belief as to the cause of the problem.

Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *Apparently SBC feels that it is.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since June 2003.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since June 2003.

3. Last known position of the opposing carrier.

SBC has yet to provide TDS Metrocom with a written position, much less acknowledge our dispute claim filed over 30 days ago.

4. Were any bill adjustments made to resolve this issue?

No

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom is not aware of any, nor has SBC communicated any.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that billing associated with collocation power is charged according to our ICA.*
2. *Audit to identify 100% of exceptions to date, billing corrected going forward and all billing adjustments including associated LPCs adjusted.*
3. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC Midwest has investigated and believes that it is billing for collocation power appropriately under TDS Wisconsin's interconnection agreement. Please see the collocation stipulation documents from Docket 6720-TI-161.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? *Yes.* If so, please explain.
TDS and SBC Midwest appear to have a different view of what is in the ICA related to power billing.
3. What performance measures can be implemented to monitor the desired system operation? *None.*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
TDS does not agree that the USOC and rate contained in its ICA are the appropriate means of billing their power. TDS also does not believe that it should be billed on a fused amp basis for all amps made available to its collocation arrangements, per TDS' collocation application.
2. Were any bill adjustments made to resolve this issue? *No.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? . Please attach any relevant accessible letter(s).
None, since SBC believes that it is billing appropriately
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *None.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*
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e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Jan Moody*
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Authorized Representative: *Sue West*

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e-mail: *sw3273@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: *TDS Metrocom*

Contact *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): *Todd McNally*

Telephone Number: *608-441-7959*

e-mail: todd.mcnally@tdsmetro.com

Authorized Representative: *Rod Cox*

Telephone Number: *608-663-3029*

e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: (short identifier) *Loop Conditioning Rates.*

1. Brief Description: *While TDS Metrocom disputes the assessing of conditioning charges in general, we have identified that SBC is charging incorrect rates for conditioning activity.*

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered?

TDS Metrocom discovered this issue in October 2002.

2. How many occurrences and approximately over how long a period of time?
Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions.

3. Is it a recurring problem?
Yes.

4. Your belief as to the cause of the problem.
Based on our understanding of SBCs process, systems and invoices, TDS Metrocom is left with the impression that the cause for this exception is the result of SBCs inadequate billing OSS. Specifically as it relates to change management controls.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *Possibly.*
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*
7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
Yes, informally via the course of our complaint filed with the Wisconsin PSC regarding Loop Conditioning.
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
Yes, informally via the course of our complaint filed with the Wisconsin PSC regarding Loop Conditioning.
3. Last known position of the opposing carrier.
This specific issue has not been addressed outside of the Loop Conditioning Complaint.
4. Were any bill adjustments made to resolve this issue?
No
5. Were any policies or procedures changed to address this issue? If so, what changes were made?
TDS Metrocom is not aware of any, nor has SBC made us aware of any..

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly.*
2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

TDS' issue description above identifies this as solely a Michigan issue. There are no

allegations pertaining to Wisconsin. Accordingly, this allegation should be dismissed from this docket.

A. Analysis of Issue

1. Your belief as to the cause of the problem. *N/A*
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *N/A*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *N/A*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *N/A*
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact: *Jim Jermain*

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Subject Matter Expert (SME): *Jim Jermain*

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Authorized Representative: *Scott VanderSanden*

Telephone Number: *(414) 270-5920*

e-mail: *sv3456@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: TDS Metrocom
Contact Todd McNally
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e-mail: todd.mcnally@tdsmetro.com

Subject Matter Expert (SME): Todd McNally
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Authorized Representative: Rod Cox
Telephone Number: 608-663-3029
e-mail: rod.cox@tdsmetro.com

IV. Issue Identification

Name: Dispute Single Adjustments Vs Multiple Adjustments

1. Brief Description: SBC requires TDS Metrocom to complete detailed dispute claim forms, identifying line item disputes, by BAN, by Bill Date, etc. However, TDS Metrocom has experienced situations when SBC acknowledges adjustments that need to be made to our account, they request that we allow them to place a lump sum credit on a single BAN as opposed to making the adjustments to the individual BANs that the charges were applied to. This creates unnecessary resource time on our part to make accounting adjustments on our side to account for this.

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? February 2003
2. How many occurrences and approximately over how long a period of time? Not applicable to this issue.
3. Is it a recurring problem? Yes.
4. Your belief as to the cause of the problem. TDS Metrocom is left to believe that the cause is due to SBCs attempt to limit the amount of resource time required of them to process dispute resolution claims without regard of the time required of the CLEC that was the victim of SBCs inaccurate billing.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? TDS Metrocom does not believe that it is.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? Low.
7. Any other pertinent information? None at this time.

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? Yes. February 2003 via phone discussions with SBC Account Management.
2. Was this issue escalated for dispute resolution? If so, when and in what forum? Yes. February 2003 via phone discussions with SBC Account Management.
3. Last known position of the opposing carrier. SBC prefers to place adjustments on TDS Metrocoms invoice via one lump sum on a single BAN when available.
4. Were any bill adjustments made to resolve this issue? Not applicable to this issue.
5. Were any policies or procedures changed to address this issue? If so, what changes were made? SBC has not communicated any policy or procedures to address this issue, nor is TDS aware of any.

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).) TDS Metrocom requests that in addition to a performance measure developed to capture such billing accuracy errors, that the following remedies get implemented by SBC:

- 1.) *SBC be required to make adjustments to CLECs invoices consistent with the manner of which charges are assessed (By BAN).*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

This issue is exactly the same as that raised in TDS Issue #20. SBC incorporates here its response to TDS Issue #20.

A. Analysis of Issue

1. Your belief as to the cause of the problem.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Frederick C. Christensen*

Telephone Number: *(414)-319-5617*

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Authorized Representative: *Carla Rowland*

Telephone Number: *214-464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose
<i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions
<ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information
<p>Submitted by: <i>TDS Metrocom</i></p> <p>Contact <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Subject Matter Expert (SME): <i>Todd McNally</i> Telephone Number: 608-441-7959 e-mail: todd.mcnally@tdsmetro.com</p> <p>Authorized Representative: <i>Rod Cox</i> Telephone Number: 608-663-3029 e-mail: rod.cox@tdsmetro.com</p>
IV. Issue Identification
<p>Name: (short identifier) <i>Double Billing Of Circuits.</i></p> <ol style="list-style-type: none"> 1. Brief Description: <i>In May 2002, TDS Metrocom discovered that SBC was inappropriately billing us for a circuit on two different invoices.</i>
V. Analysis of Issue
<p>Please answer the following questions:</p> <ol style="list-style-type: none"> 1. When this issue was first discovered? <i>TDS Metrocom discovered this issue in May 2002.</i>

2. How many occurrences and approximately over how long a period of time?

Exact number of occurrences is unknown at this time as we continue to research our invoices to identify additional exceptions. This specific exception caused billing accuracy errors for 5 months and took SBC 9 months to resolve.

3. Is it a recurring problem?

TDS Metrocom continues to research for additional exceptions.

4. Your belief as to the cause of the problem.

SBC has already acknowledged that this specific exception was caused due to moving a circuit from one account to another and they failed to stop billing the circuit on the original invoice. Obviously the result of SBCs inadequate billing OSS.

5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *TDS Metrocom is not aware of any specific interpretation issues.*

6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? *High*

7. Any other pertinent information? *Not at this time. We reserve the right to add additional information as it becomes available.*

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since May 2002.

2. Was this issue escalated for dispute resolution? If so, when and in what forum?

Yes. Via numerous conversations and written communication with SBC Account Management including disputing these charges formally since May 2002.

3. Last known position of the opposing carrier.

SBC has acknowledged the validity of our dispute claim.

4. Were any bill adjustments made to resolve this issue?

Yes.

5. Were any policies or procedures changed to address this issue? If so, what changes were made?

TDS Metrocom can only assume that SBC is in the process of making changes.

VII. Relief Sought

TDS Metrocom requests that in addition to a performance measure developed to capture such exceptions to SBCs billing OSS, that the following remedies be implemented by SBC:

1. *Audit of SBCs current process to assure that 100% of exceptions are corrected and billing stopped and adjusted accordingly, including any associated LPCs.*
2. *Provide documentation of SBCs process in place to assure that future exceptions are prevented.*

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
Manual service representative error for failing to clear an order in error status in a timely manner. Not indicative of any systemic problems.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
SBC does not believe this issue to involve an interpretation or application of law.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?
SBC is only aware of a single instance in Wisconsin where it billed TDS for the same circuit under both a collocation billing account number ("BAN") and an access BAN. Prior to 2000, access services and collocation services were billed on the same BAN. A special project was implemented to separate the two services into two separate BANs. This error occurred after SBC moved a TDS access circuit from a collocation BAN to an access BAN.

Although the order connecting the circuit to the new access BAN was processed, the order disconnecting the circuit from the collocation BAN flowed into error status. Once SBC realized its error, an order was issued to remove the circuit from the collocation BAN. This was a special project and an adjustment has already been applied. Notably, the amount in dispute as a result of this claim represents only about 0.5% of TDS's total collocation billing over the relevant billing period. Given that TDS Metrocom readily admits that this was discovered in May of 2002 and that TDS Metrocom has not provided any subsequent examples of this issue since that time, it appears that this was indeed a one-time occurrence and not indicative of a systemic problem.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *See above.*
2. Were any bill adjustments made to resolve this issue? *See above.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *See above.*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *See above.*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact: *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Fred Christensen*

Telephone Number: *(414) 319-5617*

e-mail: *fc1618@sbc.com*

Authorized Representative: *Carla Rowland*

Telephone Number: *(214) 464-7511*

e-mail: *cb8043@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*